

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

ROSY GIRON DE REYES; JOSE  
DAGOBERTO REYES; FELIX ALEXIS  
BOLANOS; RUTH RIVAS; YOVANA  
JALDIN SOLIS; ESTEBAN RUBEN MOYA  
YRAPURA; ROSA ELENA AMAYA; and  
HERBERT DAVID SARAVIA CRUZ,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP; WAPLES PROJECT  
LIMITED PARTNERSHIP; and A.J.  
DWOSKIN & ASSOCIATES, INC.,

*Defendants.*

Civil Action No. 1:16cv00563-TSE-TCB

**PLAINTIFFS' MOTION TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz ("Plaintiffs") respectfully move the Court to file under seal Exhibits 1, 5–6, 12–31, 33–34, 36–38, 41, 43, 46, 49, and 51 to Plaintiffs' Cross Motion for Summary Judgment and Opposition to Defendants' Motion for Summary Judgment, which consists of documents Plaintiffs and Defendants produced during the course of discovery and marked confidential pursuant to the Protective Order. (Dkt. No. 45.), documents containing Plaintiffs' personal identifying information, and excerpts from deposition transcripts. In support of this Motion, Plaintiffs are submitting a Non-Confidential Memorandum, along with an appropriate Notice and Proposed Order.

DATED this 23rd day of December, 2016 Respectfully submitted,



---

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

Paul Brinkman, VSB # 35950

Jeanhee Hong (*pro hac vice*)

Ariel Wade Trajtenberg (*pro hac vice*)

Diego Durán de la Vega (*pro hac vice*)

Jongwook Kim (*pro hac vice*)

William A. Margeson (*pro hac vice*)

Archith Ramkumar (*pro hac vice*)

777 Sixth Street NW, 11<sup>th</sup> Floor  
Washington, District of Columbia 20001

Phone: (202) 538-8000

Fax: (202) 538-8100

[paulbrinkman@quinnemanuel.com](mailto:paulbrinkman@quinnemanuel.com)

[jeanheehong@quinnemanuel.com](mailto:jeanheehong@quinnemanuel.com)

[arieltrajtenberg@quinnemanuel.com](mailto:arieltrajtenberg@quinnemanuel.com)

[diegoduran@quinnemanuel.com](mailto:diegoduran@quinnemanuel.com)

[wookiekim@quinnemanuel.com](mailto:wookiekim@quinnemanuel.com)

[billmargeson@quinnemanuel.com](mailto:billmargeson@quinnemanuel.com)

[archithramkumar@quinnemanuel.com](mailto:archithramkumar@quinnemanuel.com)

LEGAL AID JUSTICE CENTER

Simon Sandoval-Moshenberg, VSB #77110

Rebecca Wolozin, VSB #89690

6066 Leesburg Pike, Suite 520

Falls Church, VA 22041

Phone: (703) 778-3450

Fax: (703) 778-3454

[simon@justice4all.org](mailto:simon@justice4all.org)

[becky@justice4all.org](mailto:becky@justice4all.org)

*Counsel for Plaintiffs*

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 23rd day of December, 2016, I filed the foregoing document electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

Grayson P. Hanes, VSB # 06614  
Michael S. Dingman, VSB #30031  
Justin deBettencourt, VSB # 83806  
REED SMITH LLP  
7900 Tysons One Place, Suite 500  
McLean, Virginia 22102  
Phone: (703) 641-4200  
Fax: (703) 641-4340  
[ghaynes@reedsmith.com](mailto:ghaynes@reedsmith.com)  
[mdingman@reedsmith.com](mailto:mdingman@reedsmith.com)  
[jdbettencourt@reedsmith.com](mailto:jdbettencourt@reedsmith.com)

*Counsel for Defendants*



---

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
Paul Brinkman, VSB # 35950

777 Sixth Street NW, 11<sup>th</sup> Floor  
Washington, District of Columbia 20001-3706  
Phone: (202) 538-8000  
Fax: (202) 538-8100  
[paulbrinkman@quinnemanuel.com](mailto:paulbrinkman@quinnemanuel.com)

*Counsel for Plaintiffs*